

**Department of Energy's Public Hearing on the Draft Environmental Impact Statement
For the Proposed**

EIS000210

Yucca Mountain Nuclear Waste Repository Program.

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Tuesday, October 26, 1999

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From 11 Am to 2 PM and 6 PM to 10 PM

At the Hall of States, 444 North Capitol Street, N.W., Washington, D.C.

My name is Albert Nunez, and I have worked most of my life on the commercialization of renewable energy technologies. I am testifying today primarily because my son is going to college just eighty-five miles from the Yucca Mountain site. So in a sense, this puts Yucca Mountain 'in my backyard'.

I shall be brief and to the point.

1. Yucca Mountain is in an unstable geologic area, which is proven by the numerous documented earthquakes that have taken place over the years. Mankind's ability to look at the geology of an area for evaluating its stability over a period of thousands and tens of thousands of years is well known. Any geologist is able to evaluate this site and conclude that historically, at least, it has been quite active and on this basis should not be a serious contender for a nuclear repository that must prevent any high level waste leakage to the biosphere for a period of time on the order of 100 thousand years.

2. It is my hypothesis that as greenhouse gasses continue to be added to the atmosphere over the next several hundred years, global climate change will be exacerbated by ever increasing severe weather events with very large water mass shifts geographically. So what? You might say ... What has that got to do with Yucca Mountain? Well, as the continental plates experience large mass load shifting, does it not stand to reason that there will be an increased incidence of seismic activity? But nuclear power does not produce any CO₂, you might add; but it does produce Pu238 which may be released to the biosphere during a seismic cataclysm.

3. Ground water migration in the area is also well documented and should add to the scientific basis for rejecting this as the final selected site as a high level nuclear repository. Please take some time to review the literature to evaluate the impacts of 'what if' scenarios if these waste chambers become flooded and radionuclides are leached into the groundwater. What have past radioecology studies at Nevada Test Site, Chernobyl, Rocky Flats, Project Rio Blanco, Hanford and other hot sites where tritium, etc. have been known to migrate off site taught us? Cannot correlations be drawn for Yucca and its surrounds? Should not the EIS

(1)

3

ask these extremely difficult, worst case questions? That way everyone goes into this Waste Priesthood, a clearly defined group of elite individuals who will need to be trained and cultivated to watch over and safeguard this waste for the material's life some tens of thousands of years, with a full understanding and at least a plan for eventual catastrophic seismic failure.

4. Well, what are we to do? We have let this genie out of the bottle, and I doubt that we are going to be able to put it back. I do not propose to have the answer to these questions, but I do know that it is quite possible to make matters worse from the present status quo. What seems to me to be a logical suggestion is to transmute the high level material to a lower grade material which will degrade to background radiation levels in hundreds of years instead of hundreds of thousands. I realize that this is easier said than done, but does it not make more sense to keep the materials where they are until we can develop a more viable method of disposal/reprocessing? I concur that something has to be done, but ideally it should be real and quantifiable, not just a shuffle of the waste materials to a new location, which is fraught with its own set of potential disasters.

4

I am sorry that I cannot offer any further advice except to say that current renewable energy technologies with optimized energy efficiency are capable of replacing both fossil and nuclear energy if the political will is there and true full life cycle cost analysis are considered. Thank you for taking your time to listen to my comments today. If there are any questions, I will try to answer them.

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(2)